

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Kristin M Foster

Debtor

Bankruptcy No. 18-34081
Judge A. Benjamin Goldgar (Lake)
Chapter: 13

OBJECTION TO CONFIRMATION

NOW COMES Quicken Loans, Inc. (hereinafter "Creditor"), through its attorney, Josephine J. Miceli of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on December 10, 2018.
2. Creditor, a party in interest, holds a Mortgage dated February 25, 2015 on the property located at 1228 Meade Court, Lindenhurst, Illinois 60046, in the original amount of \$311,889.00.
3. The payoff balance due as the filing date of this case is \$326,024.62.
4. Creditor's arrearage claim is \$22,909.84.
5. The total amount to be paid by the Debtor to the Trustee for distribution on all claims is only \$11,342.00. The plan appears to require at least \$37,778.54 to be fully funded. The plan is not feasible.

WHEREFORE, Quicken Loans, Inc. prays that confirmation of the Debtor's plan be denied and for such other relief as the Court deems just.

/s/ Josephine J. Miceli

Josephine J. Miceli, IL ARDC 6243494

Josephine J. Miceli
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Chicago, Illinois 60606
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NOTICE:

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE

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NOTICE OF FILING

TO: Kristin M Foster, 1228 Meade Court, Lindenhurst, IL 60046
Glenn B Stearns, 801 Warrenville Road, Suite 650, Lisle, IL 60532
David M. Siegel, David M. Siegel & Associates, 790 Chaddick Drive, Wheeling, IL 60090
Patrick S Layng, Office of the U.S. Trustee, Region 11, 219 S Dearborn St, Room 873, Chicago, IL 60604

Please take notice on February 21, 2019, the attached Objection to Confirmation of was electronically filed with the Clerk of the Bankruptcy Court for the Northern District of Illinois.

CERTIFICATE OF SERVICE

I, Josephine J. Miceli, an attorney, certify that I served the attached Objection to Confirmation by mailing a copy to the Debtor at the address listed above by depositing the same in the U.S. mail, first class, postage prepaid at 230 W. Monroe St., Chicago, IL 60606 on or before 5:00 p.m. on February 21, 2019. The remaining parties were served by the CM/ECF electronic noticing system.

/s/ Josephine J. Miceli

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